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VIA ECF

February 13, 2018

Hon. Debra C. Freeman  
United States Magistrate Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

**Re:** Lehal v. United States Marshal Service, et al., Docket No. Case No.: 13-CV-3923 (DCF)  
Our File No.: 10899.00252

Dear Judge Freeman:

We represent Central Falls Detention Facility Corp. ("CFDFC") and Dr. Edward Blanchette in the above-referenced case. All authorized discovery in this action has been completed, and we are writing now to propose a briefing schedule for respective motions for summary judgment that the CFDFC defendants and the U.S. Marshal defendants intend to file.

After consultation with counsel for the U.S. Marshal defendants, we propose the following schedule: motions to be served and filed by March 23, 2018; opposition to be served and filed by May 4, 2018; and replies to be served and filed by May 25, 2018.

We have e-mailed plaintiff's pro bono discovery counsel to determine whether they will seek to continue to represent plaintiff as the action proceeds, and if so, whether this proposed schedule is agreeable. An e-mail sent February 8, 2018, a follow-up e-mail sent February 12, 2018, and a voice-mail message left this morning remain unanswered. Accordingly, we are sending a copy of this letter to Mr. Lehal at the address on file.

If the proposed schedule is acceptable to the Court, we request that Your Honor endorse this letter, and the defendants will proceed accordingly.

Respectfully submitted,

Wilson Elser Moskowitz Edelman & Dicker LLP

A handwritten signature in black ink, appearing to read 'Lalit K. Loomba', written over a horizontal line.

Lalit K. Loomba

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Cc: Counsel of Record via ECF

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